

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

MARY BLOODSWORTH, et al.,                     )  
   )  
Plaintiffs,   )  
   )  
v.   ) CIVIL ACTION NO. 2:05cv622-d  
   )  
SMITH & NEPHEW, et al.,                     )  
   )  
Defendants.   )

STATE OF ALABAMA             )  
MONTGOMERY COUNTY         )

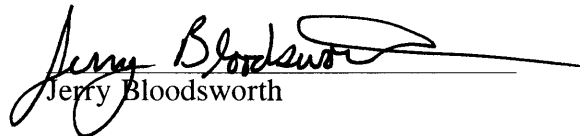
**AFFIDAVIT OF JERRY BLOODSWORTH**

Comes now the undersigned, Jerry Bloodsworth, and after having been duly sworn, deposes and says as follows:

My name is Jerry Bloodsworth and I am over the age of nineteen (19) years. I have personal knowledge of the matters contained in this affidavit.


Following surgery I accompanied my wife, Mary Bloodsworth, to a follow-up visit with Donald F. Hodurski, M.D., who had performed a hip replacement and subsequent revision surgeries on her. During this visit, Dr. Hodurski discussed the surgeries and problems Mary had suffered. Dr. Hodurski told us that the surgery had to be postponed because the Smith & Nephew part he had needed in January had not been put into production at that time. He also said he had told the Smith & Nephew representative that he would have never put the Smith & Nephew prosthesis in my wife's hip had he known all of the pieces he could need were not in production.

Further, affiant says not.

  
Jerry Bloodsworth

STATE OF ALABAMA             )  
MONTGOMERY COUNTY         )

Sworn to and subscribed before me, this 28 day of July, 2005.

  
Notary Public  
My Commission Expires: 8/4/07